

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHEA DEVELOPMENT CORP., BRAVERA INC.,
and IP HOLDING OF NEVADA CORP.,

Plaintiffs,

- against -

CHRISTOPHER WATSON and ELIZABETH ANNE
CONLEY,

Defendants.
-----X

**DECLARATION OF JAMES
DAVIES IN SUPPORT OF
APPLICATION FOR
SUBSTITUTION OF
COUNSEL**

07-CV-11201 (DLC) (GWG)

I, **JAMES DAVIES**, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am admitted to practice in the State of New York and before the bar of this Court.
2. I am a member of the law firm Landman Corsi Ballaine & Ford P.C., which maintains its New York office at 120 Broadway, 27th Floor, New York, New York 10271-0079, and am fully familiar with the facts set forth below.
3. I respectfully submit this Declaration in support of the application by Defendant Christopher Watson (hereinafter "Defendant"), pursuant to Rule 1.4 of the Local Rules of this Court, to relieve Jeffrey A. Simes, Esq. of the law firm Goodwin Procter, LLP, 599 Lexington Avenue, New York, New York 10022 as attorneys of record for Defendant in this matter and replace that law firm with the law firm of Landman Corsi Ballaine & Ford P.C.
4. Attached hereto is a fully executed consent to change attorney form executed by your Declarant, Defendant and Jeffrey A. Simes, Esq., the attorney being displaced as counsel of record for Defendant.


5. Your Declarant respectfully submits that neither the Court nor any other party in this litigation would be prejudiced by this substitution.

6. This action was commenced on December 12, 2007 and issue has not yet been joined due to a pending motion to dismiss for lack of subject matter jurisdiction. The initial Pretrial Scheduling Order was only held on April 14, 2008.

7. A copy of the instant application by Defendant is being served on Plaintiffs.

WHEREFORE, it is respectfully requested that this Court issue an order allowing the law firm of Landman Corsi Ballaine & Ford P.C. to be substituted as counsel of record for Defendant in the place and stead of the law firm Goodwin Procter LLP, in this action and that this Court direct the Clerk of the Court to make all appropriate entries reflecting this substitution of counsel in this Court's records.

Dated: New York, New York
April 28, 2008


James Davies (JD-0599)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

- against -

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**CONSENT TO CHANGE
ATTORNEY**

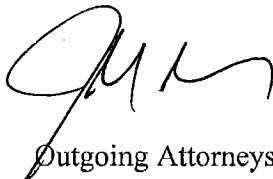
07-CV-11201

We, the undersigned, do hereby consent and agree that the law firm Goodwin Procter LLP, attorneys of record for Defendant Christopher Watson (hereinafter "Defendant"), with offices at 599 Lexington Avenue, New York, New York 10022, be changed and that Landman Corsi Ballaine & Ford P.C., with offices at 120 Broadway, 27th Floor, New York, New York 10271-0079, be substituted as attorneys for Defendant in the place and stead of Goodwin Procter, LLP.

Dated: New York, New York
April 23, 2008

Goodwin Procter, LLP


By:



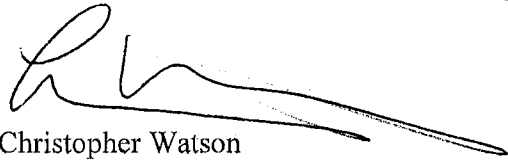
Outgoing Attorneys for Defendant
599 Lexington Avenue
New York, New York 10022
(212) 813-8879

LANDMAN CORSI BALLAINE & FORD P.C.

By:


James Davies
Incoming Attorneys for Defendant
120 Broadway, 27th Floor
New York, New York 10271-0079
(212) 238-4800

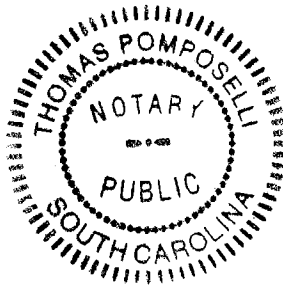
By:


Christopher Watson

Sworn to before me this

23 day of April, 2008


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

- against -

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Defendants.
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**ORDER SUBSTITUTING
COUNSEL**

07-CV-11201 (DLC) (GWG)

Upon the annexed declaration of James Davies, dated April 28, 2008, and the executed consent to change attorney form annexed thereto, it is hereby:

ORDERED that, pursuant to Rule 1.4 of the Local Civil Rules of this Court, James Davies, Esq. of the firm Landman Corsi Ballaine & Ford P.C., 120 Broadway, 27th Floor, New York, NY 10271-0079, be and hereby is substituted as counsel of record for Defendant Christopher Watson in the place and stead of Jeffrey A. Simes of the firm Goodwin Procter LLP, 599 Lexington Avenue, New York, New York 10022.

Dated: New York, New York
April 28, 2008

Honorable Denise L. Cote
U.S. District Judge

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

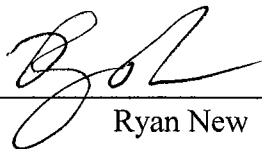
RYAN NEW, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at NEW YORK, NEW YORK.

That on the 28th day of April, 2008, deponent served the within **DECLARATION OF JAMES DAVIES IN SUPPORT OF APPLICATION FOR SUBSTITUTION OF COUNSEL AND PROPOSED ORDER** upon:

Thomas V. Marino, Esq.
Dunnington Bartholow & Miller LLP
477 Madison Avenue
New York, NY 10022

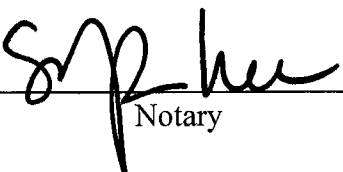
Jeffrey A. Simes, Esq.
Goodwin Procter LLP
599 Lexington Avenue
New York, New York 10022

attorneys in this action, at the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States post office department within the State of New York.



Ryan New

Sworn to before me this
28th day of April, 2008



Notary

SOPHIA REE
Notary Public, State of New York
No. 02RE6130625
Qualified in Kings County
Commission Expires July 18, 2009